

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT OF
ALABAMA

Courtney Boyl

Plaintiff

VS.

Dr. Donbaze et al.

Defendants.

2006 NOV 27 A 10:23

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

NO. 2:06-CV-511-20-H20

MOTION FOR GOOD CAUSE SHOWING

Comes Now The plaintiff Courtney Boyl makes into this Honorable Court Pursuant to Rule 36(a) and 405 Fed. R. C.V. Proc. The plaintiff submit the following in support of this motion:

1. Rule 36(a) A party may serve upon any other party a written request for admission for purposes of the pending action only, of the truth of any matters within the scope of Rule 36(c) set forth in the request that relate to statements or opinions of fact or of the application of law to fact, including the genuineness of any document described in the request.

2. Rule 405. Methods of proving Character: In all cases in which evidence of character or a trait of character of a person is admissible, proof may be made by testimony as to reputation or by testimony in the form of an opinion.

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3. The Plaintiff request for the Defendants to answer the following question within (30) days of receiving this Motion:

1. Each Defendant to listed their full ~~name~~ name and age?

A.

2. Each Defendant to stated where they are married or if they are single?

A.

3. Each Defendants to state where not they have any children it was under 18 years, please state how many and their age?

A.

4. Each Defendant to stated the county which they live, and how long have they been a resident of the state of Alabama?

A.

5. Each Defendant to listed and produce a copy of their medical license, including any special classes they have been in?

A.

6. Each Defendant to state how long they have been employed by Prison Health Service?

A.

7. Defendant Kay Wilson to answer. Where are not did Dr. Darboze ever tell her that he did not take the plaintiff back brace? Did the plaintiff ever write you asking you to get Dr. Darboze to give him his brace?

A.

8. Defendant Joan Darboze to answer. Did you ever tell Kay Wilson that the plaintiff gave you his back brace? Is it standard for a Doctor to keep give someone medication, if he feels that there nothing wrong with him?

A.

9. Defendant Cynthia Zucimble to answer. Did you not see the plaintiff on 6-11-06, when he was taken to the HCU by the Officers and inmate on the stretcher, because his entire lower body had gone out? Is it standard for a nurse to tell an inmate to sign up for sick call when they get on call saying his entire lower body and lower back had gone out?

10. The Plaintiff will ask these questions at the hearing of this Case, and he requests that the defendant answer these questions under Oath. The Plaintiff. Some of these questions to get a better understanding of the Methods and Character. To answer these questions will demand the Plaintiff to be prepared for the hearing of this Case. The Plaintiff request for discovery but some how this hearing will think that the Plaintiff have this information but he does not. So therefore he need these questions answered. Answering these questions will not be in ~~the~~ no way hurt the Defendant but ~~the~~ if the Defendant does not answer these questions, I will hurt the Plaintiff and his case.

Wherefore The Plaintiff prays that the 5 Defendants will answer these questions within ~~10~~ (10) days of receiving them. Because they will be used at the hearing of this Case.

Courtney Dyer

Certificate of Service

I hereby Certify that I have served a copy of the foregoing upon the Defendants Counsel by placing it into Fastalking Curr. Fac. Mail box on NOV. 21 2006.

Courtney Dyer

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